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November 12, 2021

VIA ECF

The Honorable Judge Vernon S. Broderick United States District Judge Southern District of New York 40 Foley Square New York, New York 10007 APPLICATION GRANTED
SO ORDERED A J. S. VERNON S. BRODERICK
U.S.D.J. 11/15/2021

Re: Tatum-Rios v. JB-NY Distributors, Inc. d/b/a TapRm, Case No. 1:21-cv-03428-VSB

Dear Judge Broderick:

We represent Defendant JB-NY Distributors, Inc. d/b/a TapRm ("Defendant") in the above-referenced matter. Together with counsel for plaintiff, we respectfully move the Court to stay all case deadlines in this action for forty five (45) days, from November 12, 2021 to December 27, 2021.

This requested stay will permit the parties to finalize their efforts to bring about the voluntary dismissal of all claims asserted in this action without further litigation. Once those efforts are complete, voluntary dismissal will be filed.

Respectfully submitted,

/s/ Karla Del Pozo García Karla Del Pozo García

cc: All counsel of record (by ECF)